



September 24, 2018

**VIA ECF**

The Honorable Michael A. Shipp  
The Honorable Lois H. Goodman  
U.S. District Court for the District of New Jersey  
Clarkson S. Fisher Building and U.S. Courthouse  
402 East State Street  
Trenton, New Jersey 08608

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Re: *In re Valeant Pharmaceuticals International, Inc. Securities Litigation*  
Master File No. 15-7658 (MAS) (LHG)

Dear Judge Shipp and Magistrate Judge Goodman:

On behalf of Defendants, we write in response to Plaintiffs' September 20, 2018 letter enclosing Class Plaintiffs' First Amended Consolidated Complaint. That letter incorrectly stated that Defendants "have consented to Plaintiffs filing this FAC, as reflected in Section IV of the parties' Joint Discovery Plan." Defendants did not consent to Plaintiffs' amendments, nor did Plaintiffs seek Defendants' consent. Section IV of the parties' Joint Discovery Plan simply sets a deadline for amended pleadings to be filed without leave of court.

We thank the Court for its attention to this matter.

Respectfully submitted,

*s/ Richard Hernandez*

Richard Hernandez

cc: All Counsel of Record (via ECF)

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